

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STARBUCKS CORPORATION,

Plaintiff,

-against-

NEW WTC RETAIL OWNER LLC

Defendant.

Case No. 1:21-cv-00400-VM

**AMENDED RULE 7.1
DISCLOSURE STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the undersigned, counsel for Defendant New WTC Retail Owner LLC, a New York limited liability corporation, certifies that this party is a non-governmental corporate party and that this party's parents and affiliates corporations are as follows:

1. The sole member of New WTC Retail Owner LLC is New WTC Retail JV LLC, a Delaware limited liability corporation.
2. The sole member of New WTC Retail JV LLC is New WTC Retail Member LLC, a Delaware limited liability corporation.
3. The sole member of New WTC Retail Member LLC is Westfield America Limited Partnership, a Delaware limited partnership.
4. Westfield U.S. Holdings, LLC, a single member Delaware LLC, is the parent entity of Westfield America Limited Partnership.
5. Westfield America Shopping Centers, LP, a Delaware limited partnership, is the parent entity of Westfield U.S. Holdings, LLC.

6. URW WEA LLC, a Delaware limited liability company, is the parent entity of Westfield America Shopping Centers, LP.
7. WEA Holdings, LLC, a Delaware limited liability company, is the parent entity of URW WEA LLC.
8. URW America Inc., a Delaware corporation, is the parent entity of WEA Holdings, LLC.
9. Unibail-Rodamco-Westfield N.V., a company organized under the laws of the Netherlands, is the parent entity of URW America Inc., and its Stapled Securities are traded on the Amsterdam Stock Exchange.

There are no publicly held corporations owning 10% or more of New WTC Retail Owner's stock.

Dated: New York, New York
March 12, 2021

BLANK ROME LLP

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